

EXHIBIT 2

Contains Highly Confidential AEO and Source Code Materials

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff

v.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**REPLY EXPERT REPORT OF DR. DAN SCHONFELD REGARDING U.S. PATENT
NO. 10,848,885 AND U.S. PATENT NO. 10,469,966**

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the claim elements where I have identified it, if not for Dr. Almeroth's opinions that the disclosed groups in the Sonos 2005 System and in the Sonos Forums do not meet the requirements of a "zone scene."

34. Additionally, Sonos Forum users understood that the Sonos 2005 System itself already provided the structure for creating groups (now zone scenes), providing an indication of those groups (now zone scenes) to the zone player, and storing those groups (now zone scenes) because this was all standard functionality of the existing Sonos 2005 System. In the Sonos 2005 System, this was implemented using for example a cramfs filesystem that is stored on flash (persistent) memory. *See* Opening Report ¶285. A POSITA would have found it straightforward to similarly use and store group information in the existing Sonos 2005 System but to store that information in these persistent structures, allowing for long-term storage of zone groups ("scenes"). This compares to Dr. Almeroth's allegations regarding the transient nature of the "ad hoc" zone groups in the Sonos 2005 System. The Sonos Forum users were merely suggesting slight modifications to the existing design to use "zone scenes" instead of the alleged "ad hoc" groups. Dr. Almeroth errs in reading the Sonos Forum posts in a vacuum rather than as suggested modifications to the Sonos 2005 System, as I described in my Opening Report. *See* Opening Report ¶ 285. A POSITA would have found it straightforward to use and store group information in the existing Sonos 2005 System, but to store that information for longer, such that the zone group remained available for selection for a longer period of time. The Sonos Forum users were merely suggesting slight modifications to the existing design to use "zone scenes" instead of the alleged "ad hoc" groups. Dr. Almeroth errs in reading the Sonos Forum posts in a vacuum rather than as suggested modifications to the Sonos 2005 System, as I described in my Opening Report.

3. Obviousness In View of Sonos Forums

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I, Dan Schonfeld, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

A handwritten signature in black ink that reads "Dan Schonfeld". The signature is written in a cursive style, with the first name "Dan" and the last name "Schonfeld" clearly legible. The signature ends with a large, circular flourish.

DATED: January 23, 2023

Dan Schonfeld, Ph.D